

EXHIBIT A

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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Case No.: 5:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
 PLAINTIFFS' REQUEST FOR
 ADDITIONAL GOOGLE CUSTODIAN**

Referral: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is the parties' joint letter brief regarding Plaintiffs' request for Google to add Bert Leung as a limited custodian ("Joint Letter Brief"). Given Mr. Leung's central role in Google's 2020 Incognito detection analysis, and Google's failure to identify Mr. Leung as an employee with relevant information, the Court hereby ORDERS Google to conduct a limited search of Mr. Leung's custodial files. The search shall be limited to the time period of 2019-2021, and the following three search terms: Incognito, ChromeGuard, "Chrome Guard." Google shall produce responsive documents at least 14 days prior to Mr. Leung's deposition.

IT IS SO ORDERED.

DATED: _____

Honorable Susan van Keulen
United States Magistrate Judge

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-3664-YGR-SVK

**[GOOGLE’S PROPOSED] ORDER
DENYING PLAINTIFFS’ REQUEST
FOR ADDITIONAL GOOGLE
CUSTODIAN**

Referral: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is the parties' joint letter brief regarding Plaintiffs' request for Google to add Bert Leung as a forty-third custodian. Having considered the Joint Letter Brief, Plaintiffs' request is hereby DENIED.

SO ORDERED.

DATED: _____

THE HONORABLE SUSAN VAN KEULEN
United States Magistrate Judge